

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Middesk, Inc.

Plaintiff,

v.

Osiris Ratings, Inc. d/b/a Baselayer, and

**Jonathan Awad, and
Josh Leviloff,**

Defendants.

CIVIL ACTION NO. 1:25-cv-02677-PKC

Jury Trial Demanded

**JOINT STIPULATION FOR TEMPORARY
RESTRAINING ORDER**

Plaintiff Middesk, Inc. (“Middesk”) and Defendants Osiris Ratings, Inc. d/b/a Baselayer (“Baselayer”) and Jonathan Awad (“Awad”) (Middesk, Baselayer, and Awad collectively referred to as the “Parties” and individually a “Party”), by and through their undersigned counsel, hereby jointly agree to this Stipulation For Temporary Restraining Order and state as follows:

On March 31, 2025, Plaintiff Middesk filed a Verified Complaint for Injunctive Relief and Damages and a Show Cause Order for Expedited Discovery in the Southern District of New York, Case No. 1:25-cv-02677 (the “Action”).

The Parties have met and conferred and hereby stipulate to the following:

1. Baselayer is restrained from using, printing, copying, distributing, disclosing, or destroying (a) any documents, including electronic files and physical files that originated from Middesk, this includes, but is not limited to electronics file(s) that Baselayer has recently identified within its possession, or (b) any information – whether

it was provided to Baselayer through documents or orally – that Baselayer reasonably understands to constitute Middesk trade secrets or confidential or proprietary information, unless Middesk consents in writing to any of the foregoing or unless such action is taken in connection with this Action.

2. Awad is restrained from using, printing, copying, distributing, disclosing, or destroying (a) any documents, including electronic files or physical files, that originated from Middesk, this includes, but is not limited to electronics file(s) that Baselayer has recently identified within its possession, or (b) any information – whether it was provided to Awad through documents or orally – that Awad reasonably understands to constitute Middesk trade secrets or confidential or proprietary information, unless Middesk consents in writing to any of the foregoing or unless such action is taken in connection with this Action.

The Parties agree that nothing in this stipulation shall prohibit Baselayer from responding to any discovery request from Middesk or complying with an order from the Court in the Action.

The Parties agree that nothing in this order shall prevent Middesk from seeking further or broader injunctive relief if necessary.

The Parties agree that nothing herein shall be deemed or construed to be (a) an admission of the truth or falsity of any actual or potential claim in the Action (including, but not limited to, that any particular information constitutes a Middesk trade secret or confidential or proprietary information), (b) an acknowledgment or admission by any Party of any fault or liability whatsoever, and (c) an admission by any Party of possessing, taking, using, printing, copying, distributing, disclosing, examining, or destroying any Middesk information. The Parties agree that

this Order shall remain in effect until (a) the Court dissolves it; or (b) the Court rules on any forthcoming Motion for Preliminary Injunction or otherwise addresses or disposes of this Action.

Dated: April 8, 2025

GREENBERG TRAURIG, LLP

/s/ Jason D. Burns

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**Signed by JDB with express permission*